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11 Attorneys for: Material Witnesses AUGUSTIN CAVERO-ORTIZ, DONACIANO RAMIREZ-
 12 MERINO, and SEVERINO RAMIREZ-MEJIA

13 **UNITED STATES DISTRICT COURT**

14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 ROBERTO TORRES-HERNANDEZ
 19 AKA: GREGORIO CRUZ-MERINO (1),
 20 MIGUEL MERINO-CALVERO (2),

21 Defendants.

22 Criminal Case No. 08 cr 1165-JM
 23 Mag. Docket No. 08 mj 0961

24 **NOTICE OF MOTION AND MOTION
 25 FOR VIDEO DEPOSITION AND
 26 RELEASE OF MATERIAL WITNESSES
 27 AUGUSTIN CAVERO-ORTIZ,
 28 DONACIANO-RAMIREZ-MERINO, and
 29 SEVERINO RAMIREZ-MEJIA**

30 JUDGE: Hon. Anthony J. Battaglia
 31 CRTRM:

32 DATE: May 20, 2008
 33 TIME: 3:30 p.m.

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 35 TO KAREN P. HEWITT, UNITED STATES ATTORNEY, LUELLA CALDITO,
 36 ASSISTANT UNITED STATES ATTORNEY, DAVID PETERSON, COUNSEL FOR
 37 DEFENDANT ROBERTO TORRES-HERNANDEZ (AKA: GREGORIO CRUZ-MERINO),
 38 AND MAHIR SHERIF, COUNSEL FOR DEFENDANT MIGUEL MERINO-CALVERO.

39 **PLEASE TAKE NOTICE** that on **May 20, 2008**, at **3:30 p.m.**, Gayle Mayfield-
 40 Venieris, counsel for the material witnesses AUGUSTIN CAVERO-ORTIZ ("CAVERO"),
 41 DONACIANO RAMIREZ-MERINO ("MERINO") and SEVERINO RAMIREZ-MEJIA

1 ("MEJIA"), will move this Court for an order to take the video deposition of the material
2 witnesses, and for their immediate release.

3 **MOTION**

4 Material witnesses CAVERO, MERINO, and MEJIA, through their counsel, Gayle
5 Mayfield-Venieris, and pursuant to Federal Rules of Criminal Procedure, Rule 15, 18 U.S.C. §§
6 3142 and 3144, hereby move this Court for an order to take their deposition by videotape and
7 release them at the conclusion of the deposition.

8 This Motion is based on this Notice and the Memorandum of Points and Authorities
9 attached and filed herewith, the records of the above-entitled case, and all matters submitted to
10 the Court prior to the determination of this Motion.

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12 Dated: May 7, 2008

Mayfield & Associates

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14 By: /s/ Gayle Mayfield-Venieris
15 Gayle Mayfield-Venieris, Esq.
16 Attorney for Material Witnesses
17 AUGUSTIN CAVERO-ORTIZ,
18 DONACIANO RAMIREZ-MERINO, and
19 SEVERINO RAMIREZ-MEJIA

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